

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INGENUS PHARMACEUTICALS, LLC,

Plaintiff,

v.

HETERO USA, INC., HETERO LABS LTD., and  
HETERO LABS LTD. UNIT-VI,

Defendants.

C.A. No. 1:24-cv-01025-JLH

**DECLARATION OF WESLEY WEEKS**

I, Wesley Weeks, an attorney duly admitted to practice law in the Commonwealth of Virginia and the District of Columbia, hereby affirm under penalty of perjury as follows:

1. I am a Partner at Wiley Rein LLP and serve as one of the attorneys for Defendants Hetero USA, Inc., Hetero Labs Ltd., and Hetero Labs Ltd. Unit-VI (“Hetero”) in this matter. I respectfully submit this declaration in support of Hetero’s Opposition to Ingenus’s Motion to Stay (“Opposition”). I have personal knowledge of the following, and if called as a witness, could testify competently thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of an email I sent to opposing counsel on Wednesday, May 28, 2025, at or around 2:08 PM.

3. Attached hereto as Exhibit 2 is a true and correct copy of an email I received from opposing counsel on Tuesday, June 3, 2025, at or around 3:03 PM and a draft stipulation that was attached to that email.

4. On May 9, 2025, in *Ingenus Pharmaceuticals, LLC, et al. v. Nexus Pharmaceuticals, Inc.*, No. 1:22-cv-02868 (N.D. Ill.), the Northern District of Illinois granted summary judgment for Defendant Nexus and held that all of the claims of the ’952 patent were

invalid. D.I. 50-1.

5. In light of the Northern District of Illinois decision, Hetero reached out on May 16, 2025, to counsel for Ingenus and requested that Ingenus agree to entry of final judgment of invalidity in this case under the doctrine of collateral estoppel. Exhibit 1.

6. The parties discussed the Northern District of Illinois's decision telephonically on May 30, June 2, and June 9.

7. During these discussions, the parties discussed Hetero's proposed summary judgment motion based on collateral estoppel and a possible stay of certain deadlines, but Ingenus did not seek to substantively discuss any outstanding discovery or claim construction issues. Through the meet and confer process, the parties had agreed to extend interim deadlines for six weeks.

8. During the meet and process, counsel for Ingenus agreed that Hetero should be permitted to file a summary judgment motion in this case based on collateral estoppel.

9. After the meet and confer on June 2, Ingenus drafted and circulated a proposed stipulation reflecting that representation. Exhibit 2.

10. The proposed stipulation states that "Ingenus agrees, subject to prior approval from the Court, that Hetero should be permitted to file a case dispositive motion on the basis described above." Exhibit 2, Draft Stipulation at 2.

11. Based upon its conversations with Ingenus, Hetero circulated on June 9 a proposed joint letter to the Court requesting a status conference and a proposed extension of the deadlines related to claim construction briefing. Ingenus refused to join the joint letter and Hetero proceeded to file its own letter seeking a status conference with the Court.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Respectfully submitted,  
Dated: June 27, 2025

/s/ Wesley Weeks

Wesley Weeks, Esq.  
WILEY REIN, LLP  
2050 M St. NW  
Washington, DC 20036  
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wweeks@wiley.law

*Counsel for Defendants Hetero USA, Inc.,  
Hetero Labs Ltd., and Hetero Labs Ltd.  
Unit-VI*

# **EXHIBIT 1**

**From:** [Weeks, Wesley](#)  
**To:** [Rachuba, L Roman](#); [Callahan, John T.](#)  
**Cc:** [Dzwonczyk, Michael R.](#); [Cooper, Luke W.](#); [Daniel A. Taylor](#); [Neal C. Belgam](#); [Morgan M. Daughton](#); [Weinstein, Corey](#); [Seth, Neal](#); [Cortlan S. Hitch](#); [Emily Greek](#); [Kenneth L. Dorsney](#)  
**Subject:** RE: Case 24-1025-JLH, Ingenus Pharmaceuticals, LLC v. Hetero USA, Inc., et al.  
**Date:** Wednesday, May 28, 2025 2:08:05 PM  
**Attachments:** [image001.png](#)

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Thanks Roman.

---

**From:** Rachuba, L Roman <[lrachuba@sughrue.com](mailto:lrachuba@sughrue.com)>  
**Sent:** Wednesday, May 28, 2025 1:50 PM  
**To:** Weeks, Wesley <[WWeeks@wiley.law](mailto:WWeeks@wiley.law)>; Callahan, John T. <[jcallahan@sughrue.com](mailto:jcallahan@sughrue.com)>  
**Cc:** Dzwonczyk, Michael R. <[mdzwonczyk@sughrue.com](mailto:mdzwonczyk@sughrue.com)>; Cooper, Luke W. <[lcooper@sughrue.com](mailto:lcooper@sughrue.com)>; Daniel A. Taylor <[DAT@skjlaw.com](mailto:DAT@skjlaw.com)>; Neal C. Belgam <[ncb@skjlaw.com](mailto:ncb@skjlaw.com)>; Morgan M. Daughton <[mdاughton@skjlaw.com](mailto:mداughton@skjlaw.com)>; Weinstein, Corey <[CWeinstein@wiley.law](mailto:CWeinstein@wiley.law)>; Seth, Neal <[NSeth@wiley.law](mailto:NSeth@wiley.law)>; Cortlan S. Hitch <[CHitch@morrisjames.com](mailto:CHitch@morrisjames.com)>; Emily Greek <[EGreek@morrisjames.com](mailto:EGreek@morrisjames.com)>; Kenneth L. Dorsney <[KDorsney@morrisjames.com](mailto:KDorsney@morrisjames.com)>  
**Subject:** RE: Case 24-1025-JLH, Ingenus Pharmaceuticals, LLC v. Hetero USA, Inc., et al.

**External Email**

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Wes, we're available Friday at 10AM. We will circulate a call-in.  
Thanks,  
Roman

---

**From:** Weeks, Wesley <[WWeeks@wiley.law](mailto:WWeeks@wiley.law)>  
**Sent:** Wednesday, May 28, 2025 1:04 PM  
**To:** Callahan, John T. <[jcallahan@sughrue.com](mailto:jcallahan@sughrue.com)>; Rachuba, L Roman <[lrachuba@sughrue.com](mailto:lrachuba@sughrue.com)>  
**Cc:** Dzwonczyk, Michael R. <[mdzwonczyk@sughrue.com](mailto:mdzwonczyk@sughrue.com)>; Cooper, Luke W. <[lcooper@sughrue.com](mailto:lcooper@sughrue.com)>; Daniel A. Taylor <[DAT@skjlaw.com](mailto:DAT@skjlaw.com)>; Neal C. Belgam <[ncb@skjlaw.com](mailto:ncb@skjlaw.com)>; Morgan M. Daughton <[mdاughton@skjlaw.com](mailto:mداughton@skjlaw.com)>; Weinstein, Corey <[CWeinstein@wiley.law](mailto:CWeinstein@wiley.law)>; Seth, Neal <[NSeth@wiley.law](mailto:NSeth@wiley.law)>; Cortlan S. Hitch <[CHitch@morrisjames.com](mailto:CHitch@morrisjames.com)>; Emily Greek <[EGreek@morrisjames.com](mailto:EGreek@morrisjames.com)>; Kenneth L. Dorsney <[KDorsney@morrisjames.com](mailto:KDorsney@morrisjames.com)>  
**Subject:** RE: Case 24-1025-JLH, Ingenus Pharmaceuticals, LLC v. Hetero USA, Inc., et al.

Hi John,

I'm writing to follow up. It's been almost two weeks since we raised this issue regarding the impact of the judgment of invalidity in the Northern District of Illinois and we still do not have your availability for a meet and confer. Please let me know what times you are available this week so that we can raise this issue with the Court, if necessary.

Thanks,  
Wes

---

**From:** Callahan, John T. <[Jcallahan@sughrue.com](mailto:Jcallahan@sughrue.com)>  
**Sent:** Friday, May 23, 2025 4:06 PM  
**To:** Weeks, Wesley <[WWeeks@wiley.law](mailto:WWeeks@wiley.law)>; Rachuba, L Roman <[lrachuba@sughrue.com](mailto:lrachuba@sughrue.com)>  
**Cc:** Dzwonczyk, Michael R. <[mdzwonczyk@sughrue.com](mailto:mdzwonczyk@sughrue.com)>; Cooper, Luke W. <[lcooper@sughrue.com](mailto:lcooper@sughrue.com)>; Daniel A. Taylor <[DAT@skjlaw.com](mailto:DAT@skjlaw.com)>; Neal C. Belgam <[ncb@skjlaw.com](mailto:ncb@skjlaw.com)>; Morgan M. Daughton <[mداughton@skjlaw.com](mailto:mداughton@skjlaw.com)>; Weinstein, Corey <[CWeinstein@wiley.law](mailto:CWeinstein@wiley.law)>; Seth, Neal <[NSeth@wiley.law](mailto:NSeth@wiley.law)>; Cortlan S. Hitch <[CHitch@morrisjames.com](mailto:CHitch@morrisjames.com)>; Emily Greek <[EGreek@morrisjames.com](mailto:EGreek@morrisjames.com)>; Kenneth L. Dorsney <[KDorsney@morrisjames.com](mailto:KDorsney@morrisjames.com)>  
**Subject:** RE: Case 24-1025-JLH, Ingenus Pharmaceuticals, LLC v. Hetero USA, Inc., et al.

**External Email**

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Wes,

Further to Roman's email, we propose that the parties also confer on the preparation of the joint claim construction chart next week when we confer on the issue you have raised.

As promised, Roman will get back to you after Memorial Day on our availability to confer next week.

Regards, John

*John Callahan*

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---

**From:** Rachuba, L Roman <[lrachuba@sughrue.com](mailto:lrachuba@sughrue.com)>  
**Sent:** Wednesday, May 21, 2025 9:10 PM  
**To:** Weeks, Wesley <[WWeeks@wiley.law](mailto:WWeeks@wiley.law)>  
**Cc:** Dzwonczyk, Michael R. <[mdzwonczyk@sughrue.com](mailto:mdzwonczyk@sughrue.com)>; Callahan, John T. <[Jcallahan@sughrue.com](mailto:Jcallahan@sughrue.com)>; Cooper, Luke W. <[lcooper@sughrue.com](mailto:lcooper@sughrue.com)>; Daniel A. Taylor <[DAT@skjlaw.com](mailto:DAT@skjlaw.com)>; Neal C. Belgam <[ncb@skjlaw.com](mailto:ncb@skjlaw.com)>; Morgan M. Daughton <[mداughton@skjlaw.com](mailto:mداughton@skjlaw.com)>; Weinstein, Corey <[CWeinstein@wiley.law](mailto:CWeinstein@wiley.law)>; Seth, Neal <[NSeth@wiley.law](mailto:NSeth@wiley.law)>; Cortlan S. Hitch <[CHitch@morrisjames.com](mailto:CHitch@morrisjames.com)>; Emily Greek <[EGreek@morrisjames.com](mailto:EGreek@morrisjames.com)>; Kenneth L. Dorsney <[KDorsney@morrisjames.com](mailto:KDorsney@morrisjames.com)>  
**Subject:** RE: Case 24-1025-JLH, Ingenus Pharmaceuticals, LLC v. Hetero USA, Inc., et al.

Wes, my apologies but we are no longer available this week. We are also still discussing the issue with our client. We will get back to you after Memorial Day on our availability to confer next week.

Best,  
Roman

---

**From:** Weeks, Wesley <[WWeeks@wiley.law](mailto:WWeeks@wiley.law)>  
**Sent:** Wednesday, May 21, 2025 4:37 PM  
**To:** Rachuba, L Roman <[lrachuba@sughrue.com](mailto:lrachuba@sughrue.com)>  
**Cc:** Dzwonczyk, Michael R. <[mdzwonczyk@sughrue.com](mailto:mdzwonczyk@sughrue.com)>; Callahan, John T. <[jcallahan@sughrue.com](mailto:jcallahan@sughrue.com)>; Cooper, Luke W. <[lcooper@sughrue.com](mailto:lcooper@sughrue.com)>; Daniel A. Taylor <[DAT@skjlaw.com](mailto:DAT@skjlaw.com)>; Neal C. Belgam <[ncb@skjlaw.com](mailto:ncb@skjlaw.com)>; Morgan M. Daughton <[mداughton@skjlaw.com](mailto:mداughton@skjlaw.com)>; Weinstein, Corey <[CWeinstein@wiley.law](mailto:CWeinstein@wiley.law)>; Seth, Neal <[NSeth@wiley.law](mailto:NSeth@wiley.law)>; Cortlan S. Hitch <[CHitch@morrisjames.com](mailto:CHitch@morrisjames.com)>; Emily Greek <[EGreek@morrisjames.com](mailto:EGreek@morrisjames.com)>; Kenneth L. Dorsney <[KDorsney@morrisjames.com](mailto:KDorsney@morrisjames.com)>  
**Subject:** RE: Case 24-1025-JLH, Ingenus Pharmaceuticals, LLC v. Hetero USA, Inc., et al.

Roman,

The Federal Circuit has made clear that “once the claims of a patent are held invalid in a suit involving one alleged infringer, an unrelated party who is sued for infringement of those claims may reap the benefit of the invalidity decision under the principles of collateral estoppel.” *See Pharmacia & Upjohn Co. v. Mylan Pharms., Inc.*, 170 F.3d 1373, 1379 (Fed. Cir. 1999) (quoting *Mendenhall v. Barber–Greene Co.*, 26 F.3d 1573, 1577 (Fed. Cir. 1994)). Following the Federal Circuit’s clear instruction, the District of Delaware routinely applies collateral estoppel to claims held invalid by other courts. *Biogen Int’l GmbH v. Amneal Pharms. LLC*, 487 F. Supp. 3d 254, 262-68 (D. Del. 2020); *Wireless Discovery LLC v. eHarmony, Inc.*, 654 F.Supp.3d 360 (D. Del., 2023); *IBM v. Rakuten, Inc.*, 2022 WL 17848779, No. 21-461-GBW, ECF 230 (D. Del., Dec. 22, 2022). The claims asserted against Hetero in this case are the same claims that were held invalid by the Northern District of Illinois. Collateral estoppel plainly applies here and judgment in favor of Hetero should be entered in this case.

In your email below, you state that Ingenus “will not agree to a judgment of invalidity based on a non-final judgment in a different case.” First, collateral estoppel is always based on a judgment in a different case. Second, we do not understand what you mean by a non-final judgment, as the Northern District of Illinois entered final judgment of invalidity on May 9. *See Ingenus Pharmaceuticals, LLC v. Nexus Pharmaceuticals, Inc.*, No. 22-cv-02868, ECF 216 (N.D. Ill., May 9, 2025). To the extent you are referring to a potential appeal of that judgment, “the law is well settled that the pendency of an appeal has no effect on the finality or binding effect of a trial court’s holding.” *Pharmacia & Upjohn Co.*, 170 F.3d at 1381 (quoting *Deposit Bank v. Board of Councilmen of City of Frankfort*, 191 U.S. 499 (1903)). Thus, collateral estoppel clearly applies “despite the . . . possibility of an appeal.” *Id.* (emphasis in original); *see also PureWick Corp. v. Sage Prods., LLC*, No. 22-cv-102, 2023 WL 2734779, at \*11 (D. Del. Mar. 31, 2023) (“[T]he pendency or possibility of an upcoming appeal in *PureWick I* is likewise no basis for a stay here. Collateral estoppel applies regardless.”).

If Ingenus will not consent to judgment notwithstanding the clear authority on this issue, please provide a time tomorrow for us to meet and confer so that we can promptly raise this matter with the Court.

Best regards,  
Wes

---

**From:** Rachuba, L Roman <[lrachuba@sughrue.com](mailto:lrachuba@sughrue.com)>  
**Sent:** Tuesday, May 20, 2025 12:24 PM  
**To:** Weinstein, Corey <[cweinstein@wiley.law](mailto:cweinstein@wiley.law)>; Seth, Neal <[NSeth@wiley.law](mailto:NSeth@wiley.law)>; Cortlan S. Hitch <[CHitch@morrisjames.com](mailto:CHitch@morrisjames.com)>; Emily Greek <[EGreek@morrisjames.com](mailto:EGreek@morrisjames.com)>; Kenneth L. Dorsney <[KDorsney@morrisjames.com](mailto:KDorsney@morrisjames.com)>; Weeks, Wesley <[WWeeks@wiley.law](mailto:WWeeks@wiley.law)>  
**Cc:** Dzwonczyk, Michael R. <[mdzwonczyk@sughrue.com](mailto:mdzwonczyk@sughrue.com)>; Callahan, John T. <[jcallahan@sughrue.com](mailto:jcallahan@sughrue.com)>; Cooper, Luke W. <[lcooper@sughrue.com](mailto:lcooper@sughrue.com)>; Daniel A. Taylor <[DAT@skjlaw.com](mailto:DAT@skjlaw.com)>; Neal C. Belgam <[ncb@skjlaw.com](mailto:ncb@skjlaw.com)>; Morgan M. Daughton <[mdaughton@skjlaw.com](mailto:mdaughton@skjlaw.com)>  
**Subject:** RE: Case 24-1025-JLH, Ingenus Pharmaceuticals, LLC v. Hetero USA, Inc., et al.

**External Email**

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Corey, we will not agree to a judgment of invalidity based on a non-final judgment in a different case. To the extent you wish to further discuss, we are available Thursday.

Regards,

Roman

---

**From:** Weinstein, Corey <[cweinstein@wiley.law](mailto:cweinstein@wiley.law)>  
**Sent:** Friday, May 16, 2025 2:30 PM  
**To:** Rachuba, L Roman <[lrachuba@sughrue.com](mailto:lrachuba@sughrue.com)>; Seth, Neal <[NSeth@wiley.law](mailto:NSeth@wiley.law)>; Cortlan S. Hitch <[CHitch@morrisjames.com](mailto:CHitch@morrisjames.com)>; Emily Greek <[EGreek@morrisjames.com](mailto:EGreek@morrisjames.com)>; Kenneth L. Dorsney <[KDorsney@morrisjames.com](mailto:KDorsney@morrisjames.com)>; Weeks, Wesley <[WWeeks@wiley.law](mailto:WWeeks@wiley.law)>  
**Cc:** Dzwonczyk, Michael R. <[mdzwonczyk@sughrue.com](mailto:mdzwonczyk@sughrue.com)>; Callahan, John T. <[jcallahan@sughrue.com](mailto:jcallahan@sughrue.com)>; Cooper, Luke W. <[lcooper@sughrue.com](mailto:lcooper@sughrue.com)>; Daniel A. Taylor <[DAT@skjlaw.com](mailto:DAT@skjlaw.com)>; Neal C. Belgam <[ncb@skjlaw.com](mailto:ncb@skjlaw.com)>; Morgan M. Daughton <[mdaughton@skjlaw.com](mailto:mdaughton@skjlaw.com)>  
**Subject:** RE: Case 24-1025-JLH, Ingenus Pharmaceuticals, LLC v. Hetero USA, Inc., et al.

Counsel,

In light of the Northern District of Illinois ruling that the '952 patent is invalid, please confirm that you will agree to a judgment of invalidity in this case. To the extent you will not agree, please let us know by Wednesday, and we will raise this issue with the Court.





Corey Weinstein  
Attorney at Law  
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**L Roman Rachuba**

Partner

**Sughrue Mion, PLLC**

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# **EXHIBIT 2**

**From:** [Callahan, John T.](#)  
**To:** [Weeks, Wesley](#)  
**Cc:** [Dzwonczyk, Michael R.](#); [Cooper, Luke W.](#); [Rachuba, L Roman](#); [Daniel A. Taylor](#); [Neal C. Belgam](#); [Morgan M. Daughton](#); [Weinstein, Corey](#); [Seth, Neal](#); [Cortlan S. Hitch](#); [Emily Greek](#); [Kenneth L. Dorsney](#)  
**Subject:** Ingenus Pharmaceuticals, LLC v. Hetero USA, Inc., et al.  
**Date:** Tuesday, June 3, 2025 3:03:52 PM  
**Attachments:** [L11036\\_2025 \(06-03\) Draft Stipulation PROPOSED Order to Permit Filing of Dispositive Motion and to Stay Deadlines \(002\).docx](#)

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**External Email**

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Wes,

Attached is the Draft Stipulation And [Proposed] Order.

Let us know if you would like to discuss.

Thanks, John

*John Callahan*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INGENUS PHARMACEUTICALS, LLC,

Plaintiff,

v.

C.A. No. 24-1025-JLH

HETERO USA, INC., HETERO LABS LTD.,  
and HETERO LABS LTD. UNIT-VI,

Defendants.

**STIPULATION AND [PROPOSED] ORDER TO PERMIT FILING  
OF A CASE DISPOSITIVE MOTION AND TO STAY CURRENT DEADLINES**

WHEREAS in this litigation, Plaintiff Ingenus Pharmaceuticals, LLC (“Ingenus”) alleges that Defendants Hetero USA, Inc., Hetero Labs Ltd., and Hetero Labs Ltd. Unit-VI. (“Hetero” or “Defendants”) infringe U.S. Patent No. 10,993,952 (“the ’952 Patent”), (D.I. 1);

WHEREAS trial in this matter is currently scheduled to begin on August 17, 2026 (D.I. 20 at ¶ 21) and the 30-month stay in this litigation is scheduled to end on March 11, 2027, (*id.* at 14);

WHEREAS Ingenus has also asserted the ’952 Patent in other litigation, including against Nexus Pharmaceuticals, Inc. in the Northern District of Illinois (“the Nexus action”), *Ingenus Pharm., LLC v. Nexus Pharm., Inc.*, No. 1:22-cv-02868 (N.D. Il.);

WHEREAS, on May 9, 2025, the Northern District of Illinois granted summary judgment, finding the ’952 Patent to be invalid as indefinite and entering final judgment for Nexus and against Ingenus in that action, *Ingenus Pharm., LLC v. Nexus Pharm., Inc.*, No. 1:22-cv-02868, ECF No. 215, 216 (N.D. Il. May 9, 2025); *see also Ingenus Pharm., LLC v. Nexus Pharm., Inc.*, 2025 WL 1359357 (N.D. Ill. May 9, 2025);

WHEREAS Ingenus has filed a Notice of Appeal in the Nexus action, *Ingenus Pharm., LLC v. Nexus Pharm., Inc.*, No. 1:22-cv-02868, ECF No. 219 (N.D. Il. May 9, 2025);

WHEREAS Hetero wishes to file a dispositive motion in this action on the basis that Ingenus' claims of infringement of the '952 Patent are barred by collateral estoppel;

WHEREAS Ingenus disagrees that collateral estoppel applies in this case and avers that this litigation should be stayed pending the appeal of the Nexus action;

WHEREAS, pursuant to ¶ 15 of the Scheduling Order (D.I. 20), Ingenus agrees, subject to prior approval from the Court, that Hetero should be permitted to file a case dispositive motion on the basis described above;

WHEREAS Ingenus and Hetero (collectively, the "Parties") are presently engaged in discovery, with briefing on claim construction scheduled over the summer, the Joint Claim Construction Chart due on September 26, 2025, and the *Markman* hearing scheduled for November 24, 2025 (D.I. 20 at ¶¶ 11-12); and

WHEREAS the Parties wish to stay all current deadlines pending briefing and resolution of Hetero's dispositive motion and Ingenus' cross motion to stay.

Now, therefore, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, subject to the approval of the Court, that:

1. No later than    June, 2025, Hetero shall file a dispositive motion on the basis of collateral estoppel, with an accompanying opening brief of no more than 20 pages;
2. No later than 14 days after Hetero has filed its dispositive motion, Ingenus shall file a cross motion to stay and shall file a combined answering brief on the dispositive motion and opening brief on the motion to stay of no more than 20 pages;
3. No later than 14 days after Ingenus has filed its motion to stay and combined opening/answering brief, Hetero shall file a combined reply brief on the dispositive motion and answering brief on the motion to stay of no more than 20 pages;

4. No later than 7 days after Hetero has filed its combined reply/answering brief, Ingenus shall file a reply brief on the motion to stay of no more than 10 pages;
5. All current deadlines in this matter are hereby STAYED; and
6. All hearings and trial in this matter are hereby CONTINUED.

Dated: June [REDACTED], 2025

SMITH, KATZENSTEIN & JENKINS LLP

/s/ [DRAFT]

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Daniel A. Taylor (No. 6934)  
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*Of Counsel:*

Michael Dzwonczyk  
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IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025.

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The Honorable Jennifer L. Hall  
United States District Judge